## REMARKS

Claims 1-4 and 6-10 are pending in the application. Claims 2-4, 6-8 and 10 have been amended. Claim 5 has been cancelled without prejudice or disclaimer. Reconsideration of this application is respectfully requested.

The Office Action rejects claim 2 under 35 U.S.C. 102(b) as anticipated by U.S. Patent No. 6,310,921 to Yoshioka et al., hereafter Yoshioka.

This rejection is respectfully traversed. Claim 2 has been amended in step (a) by changing "data to be used" to "prediction data" for compatibility with the remainder of the claim.

The Examiner reads the primary memory on FIFO buffer 4 of Yoshioka. Buffer 4 is used to store coded current data frames that are being presented for decoding and not prediction data as recited in amended claim 2. Therefore, Yoshioka lacks the steps of generating the first and second selection signals.

Claim 2 has been further amended to recite:
"generating a prediction signal by manipulating said prediction data residing in said primary memory; and
using said prediction signal to provide motion compensation in a decode of said predictively encoded data stream".

As noted above, Yoshioka lacks prediction data stored in buffer 4. Therefore, Yoshioka lacks the steps of generating a prediction signal and using the prediction signal to provide motion compensation as recited in amended claim 2.

For the reason set forth above, it is submitted that the rejection of claim 2 under 35 U.S.C. 102(b) as anticipated by Yoshioka is obviated by the amendment and should be withdrawn.

The Office Action rejects claims 1, 3-7 and 10 under 35 U.S.C. 103(a) as unpatentable over U.S. Patent No. 5,675,387 to Hoogenboom et al., hereafter Hoogenboom in view of Yoshioka.

This rejection is respectfully traversed. This rejection is moot as to claim 5, which has been canceled.

With respect to claim 1, which recites an encoding method, Hoogenboom and Yoshioka disclose only a decoding method and not an encoding method. Therefore, the combination of Hoogenboom and Yoshioka does not disclose the encoding method claimed by claim 1.

Claims 3, 4, 6, 7 and 10 recite an external memory and a primary memory. The Examiner admits that Hoogenboom does not disclose the primary memory. The Examiner contends that Yoshioka's FIFO buffer 4 is a primary memory. The Examiner concludes that it would have been obvious to one of ordinary skill in the art to add Yoshioka's buffer 4 to Hoogenboom"s system. As noted above, Yoshioka's FIFO buffer 4 stores a current data frame. It does not store "selected ones of said previously decoded reference data frames" as recited in amended claim 3.

Claim 3 has been further amended to recite;

"searching said primary memory for a best match between a current one of said data frames and said previously decoded data frames, wherein step (a) uses said best match to provide motion compensation.".

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Neither Hoogenboom nor Yoshioka discloses the recited step of searching the primary memory for the best match. Therefore, amended claim 3 is unobvious over the combination of Hoogenboom and Yoshioka.

Claim 4 has been amended to incorporate canceled claim 5. Amended claim 5 recites that the "primary memory is dedicated to a motion compensation function of data decoding". Yoshioka's buffer 4 is not dedicated to a motion compensation function. Therefore, amended claim 4 and its dependent claim 6 are unobvious over the combination of Hoogenboom and Yoshioka.

Amended claim 7 recites:

"wherein said internal primary memory is dedicated to a motion compensation function of decoding".

Yoshioka's buffer 4 is not dedicated to a motion compensation function. Yoshioka's buffer 4 is not dedicated to a motion compensation function. Therefore, amended claim 7 is unobvious over the combination of Hoogenboom and Yoshioka.

Claim 10 has been amended to recite:

"controlling a transmittal of signals to, and a reception of signals from, a high speed primary memory for storage and retrieval of data frames being decoded currently and of selected ones of said previously decoded reference data frames".

Neither Hoogenboom nor Yoshioka discloses "a high speed primary memory for storage and retrieval of data frames being decoded currently and of selected ones of said previously decoded reference data frames". Therefore,

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amended claim 10 is unobvious over the combination of Hoogenboom and Yoshioka.

Claim 10 has been further amended to recite:

"searching said primary memory for a best match between a current one of said data frames and said previously decoded data frames, wherein step (a) uses said best match to provide motion compensation".

Neither Hoogenboom nor Yoshioka discloses the recited searching step. Therefore, amended claim 10 is unobvious over the combination of Hoogenboom and Yoshioka.

For the reason set forth above, it is submitted that the rejection of claims 1, 3, 4, 6, 7 and 10 under 35 U.S.C. 103(a) is obviated by the amendment and should be withdrawn.

The Office Action rejects claims 8 and 9 under 35 U.S.C 103(a) as unpatentable over U.S. Patent No. 5,576,767 to Lee et al., hereafter Lee, in view of Yoshioka.

This rejection is erroneous. The Examiner admits that Lee does not disclose a primary memory model coupled to a motion estimator, but contends that Yoshioka does. However, Yoshioka's FIFO buffer 4 temporarily stores a current data frame and does not constitute a primary memory model. Therefore, Yoshioka does not disclose a primary memory model coupled to a motion estimator as claimed in independent claim 8.

For the reason set forth above, it is submitted that the rejection of claims 8 and 9 and under 35 U.S.C. 103(a) is erroneous and should be withdrawn.
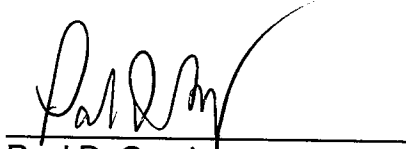
It is respectfully requested for the reasons set forth above that the rejections under 35 U.S.C. 102(b) and 35 U.S.C. 103(a) be withdrawn, that claims 1-4 and 6-10 be allowed and that this application be passed to issue.

For the reasons set forth above, it is submitted that this amendment places the application in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and passed to issue. If this amendment is deemed to not place the application in condition for allowance, it is respectfully requested that it be entered for the purpose of appeal.

Respectfully Submitted,

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